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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOSEPH DURAN, JOHN BELL, JASON MEARS,
VICTOR DESIMONE, CHRISTINA LEE and
SARAH CATALDO,

Plaintiffs,

vs.

THE HERSHEY COMPANY,

Defendant.

Case No. 3:14-CV-01184 RS

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO EXTEND CERTAIN
DEADLINES**

Hon. Richard Seeborg

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs John Bell, Jason Mears, Victor DeSimone, and Christina Lee (“Plaintiffs”) and Defendant The Hershey Company (“Defendant”) (collectively, “Parties”), through their respective counsel of record, and subject to the approval of the Court, hereby stipulate as follows:

1. WHEREAS, on June 26, 2014, the Court issued a Case Management Order setting certain deadlines (Dkt. No. 23);

2. WHEREAS, on October 16, 2014 and January 1, 2015, the Court issued Orders approving the Parties’ stipulations to extend the mediation deadline and certain other deadlines in this matter (Dkt. Nos. 29 & 31);

3. WHEREAS, the Parties are actively engaged in discovery. The Parties have produced substantial documents, negotiated an ESI agreement, produced ESI pursuant to that agreement, Defendant has taken the depositions of all Plaintiffs, and Plaintiffs have scheduled the depositions of Defendant’s witnesses; two of which will need to be taken after the close of the June 15, 2015 fact discovery deadline, and including one on June 17, 2015 in San Francisco;

4. WHEREAS, Plaintiffs disclosed an economic damages expert report on May 14, 2015 and, for the convenience of the parties and to save on expenses, Plaintiffs experts’ are available for deposition on June 16, 2015;

5. WHEREAS, Defendant has a conflict with the case management conference that was rescheduled for June 25, 2015 and the parties have agreed to move the case management conference deadline to August 6, 2015;

6. THEREFORE, the Parties hereby agree and stipulate to the extension of these four deadlines as follows:

Event	Current Deadline	Proposed Deadline
Supplemental and Rebuttal Expert Disclosures	June 4, 2015	July 1, 2015
Close of Expert Discovery	June 15, 2015	July 15, 2015
Deadline to take the depositions of Mark Parlin and Greg Welte	June 15, 2015 (close of fact discovery)	June 17, 2015

Case Management Conference	June 25, 2015	August 6, 2015
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IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED: May 19, 2015.

MORGAN, LEWIS & BOCKIUS LLP
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MICHAEL J. PUMA
ELEANOR R. FARRELL

By: /s/Michael J. Puma

Michael J. Puma

Attorneys for Defendant
THE HERSHEY COMPANY

DATED: May 19, 2015.

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By: /s/ Brian J. Malloy

Brian J. Malloy

Attorneys for Plaintiffs

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 5/19/15



Hon. Richard Seeborg
United States District Court Judge